

**IN THE DRAWINGS**

Applicants acknowledge that the Examiner has accepted the drawings filed on April 15, 2005.

## **REMARKS**

By way of this amendment, claims 1, 6, 9, 15, 17, 21 and 24 have been amended. No new matter is added. Claims 5 and 20 have been cancelled without prejudice. Accordingly, claims 1-4, 6-19, 21-24 are pending in the instant application. Applicants respectfully request reconsideration of the application in view of the amendments and remarks set forth below.

In the Office Action, claims 2, 13 and 18 were objected to because of informalities. Likewise, claims 11 and 12 were objected to because of informalities in view of the use of the term “second data session.”

In objecting claim 2, the Examiner alleges that Applicant’s use of “bridging” is confusing. More specifically, the Examiner interprets the phrase “bridging the initiation signal from the calling-from-party with the established voice link to the calling-to-party” as “bridging an initiation signal from a caller with a voice link.” As a result, the Examiner construes the term “bridging” as bridging a voice link between a calling party and a called party. See Office Action, page 2.

The Examiner asserts that a data signal (initiation signal) is bridged with a voice link and then questions the purpose of bridging these two different signals (voice and data). Applicant respectfully submits that in the Office Action dated November 23, 2005, the Examiner erred in interpreting Applicant’s claim 2. As stated in the Specification of the present application, in one example of a call flow, a calling-from-party 340 may initiate a voice call to a calling-to-party 370 over circuit-switched network 310. In turn, a mobile switching center (MSC) may then send

the call control to service control point/service node 330. Thereafter, the service control point/service control node 330 may determine if the calling-to-party 370 is a subscriber to the multimedia service. If so, the service control point/service node 330 may transmit a video clip URL to the calling-from-party 330. This step may be realized through a SIP INVITE.

The service control point-service node 330 may bridge the two voice call legs together. Consequently, the calling-from-party 340 and calling-to-party 370 may complete a voice conversation. See Applicant's Specification on page 12, lines 22-25.

After the service control point/service node 330 establishes the voice call with the calling-to-party 370, it may transmit a termination message to the calling-from-party 340 to terminate a SIP session in which a video clip may be transmitted. See Applicant's Specification, page 12, lines 17-22. Thus, bridging the service control point/service node 330 may initiate a voice call to calling-to-party 370. Once the video clip URL is transmitted, the calling-from-party 340 may receive the multimedia content associated with the URL from the video server 360. The video server 360 may send the multimedia content to the calling-from-party 340. Therefore, the Specification clearly discloses bridging the initiation signal from the calling-from-party with the established voice link to the calling-to-party.

In this way, by collaborating a data service over a PS type network with a voice service over a CS type network, the service control point/service node 330 may bridge the initiation signal and the intermediate voice link (step 270). See Specification, page 10, lines 23-27. This statement further clarifies that bridging the initiation signal and the intermediate voice link may be provided by the service control point/service node 330. Accordingly, the Examiner erred in

asserting that “bridging” is bridging a voice link between a calling party and a called party in the Office Action. Although there are other instances of adequate disclosure in the Specification to support the subject matter recited in claim 2, in the interest of being concise, Applicant has provided the limited examples herein. It should be noted that there are various other portions of the specification that adequately support all the limitations of claim 2.

For at least the reasons set forth above, Applicant’s respectfully traverse the objection to claims 2, 13 and 18, and respectfully assert that claims 2, 13 and 18 are allowable.

The Examiner objected to claims 11 and 12 because of informalities. In particular, the Examiner indicated that “second data session” in claims 11 and 12 should be changed to “first data session.” The rationale provided by the Examiner is based on the Examiner’s interpretation that the second data session in claim 10 is for receiving the uniform (or universal) resource locator. Applicant disagrees. The Examiner erred in asserting that the “second data session” should be changed to “first data session.” In other words, this assertion is not properly supported by the Applicant’s Specification. To the contrary, the Applicant’s disclosure provides that the uniform resource locator may be transmitted over a data link (for example, data session). For example, at step 230 in Figure 2, a first data link may be established to the calling-from-party conveying a uniform resource locator (“URL”). See Applicant’s Specification, page 9, lines 20- page 10, line 8. Accordingly, the Examiner is in error as to the first and second data sessions. Applicant respectfully submits that the above support cited for the first and second data sessions (links), as set forth in claims 11 and 12, are merely exemplary, and that the disclosure provides support for these features at numerous other instances throughout the patent Specification.

In the Office Action mailed November 23, 2005, claims 1-7, 9-13, 15-22 and 24 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 6,658,100 to Lund (hereinafter “**Lund**”) and U.S. Patent No. 6,480,484 to Morton (hereinafter “**Morton**”) as well. In addition, dependent claims 8, 14 and 23 were further rejected under 35 U.S.C. 103(a) as being unpatentable over **Lund**. Applicant respectfully traverses the Examiner’s rejections.

An anticipating reference by definition must disclose every limitation of the rejected claim in the same relationship to one another as set forth in the claim. Amended independent claim 1 calls for, among other things, determining if the calling-to-party is a service subscriber. **Lund**, on the other hand, determines whether the customer premise equipment (CPE) of a calling party can display a webpage. In other words, **Lund** determines a displaying capability for a webpage, which is distinct from determining if the calling-to-party is a service subscriber because the latter involves a subscription check. **Lund** is silent with regard to such a test. Based on the above-indicated legal standard, it is respectfully submitted that **Lund** fails to anticipate claim 1 since **Lund** determines functionality of the equipment associated with the calling party instead of status about a user or subscriber. Thus, claim 1 and claims dependent therefrom are in condition for allowance, which is respectfully requested of the Examiner.

**Lund** is directed to automatically retrieving and displaying supplemental information about a called party on the customer premise equipment (CPE) of a calling party. By using a universal resource locator (URL) the customer precise equipment of the calling party retrieves the homepage of the called party from the Internet. See Abstract of **Lund**. In this way, **Lund** allows the called party to communicate in a more detailed way with callers based on the

supplemental information about the called party. The URL is an example of the supplemental information about the called party. See *Lund*, col. 1, lines 41-56.

*Lund* fails to teach one or more of the claimed features. For example, *Lund* at least does not teach determining if the calling-to-party is a service subscriber. In contrast, *Lund* determines whether the CPE 106 of the calling party can display a webpage using the URL of the called party. As stated in *Lund*, application software resident in the CPE of the calling party uses the URL to retrieve the homepage of the called party.

While *Lund* teaches checking the capability of an application software as to whether it can retrieve the URL for display, *Lund* does not teach determining if the calling-to-party is a service subscriber. Moreover, *Lund* teaches use of AIN software located in the SSB 24 to formulate and transmit a query to the SCP 40 via STP 36. The SCP 40 queries the database 44 to determine how to handle the call and what services to provide the calling and called parties using information about the originating caller and the dialed number. In this way, *Lund* teaches away from using the customer precise equipment (CPE) 106 of the calling party to determine if the called party is a service subscriber. Accordingly, *Lund* fails to teach one or more of claimed features of claim 1.

For at least the reasons set forth above, independent claim 1 and claims dependent therefrom are not anticipated by *Lund*. Accordingly, claim 1 and its dependent claims are in condition for allowance, which is respectfully requested of the Examiner. For at least the aforementioned reasons, independent claims 9, 15, 22, and 24 and their respective claims are not anticipated by *Lund*. Therefore, claims 1-7, 9-13, 15-22 and 24 are allowable.

With respect to the claim 1 rejection, the Examiner asserts that **Morton** anticipates claim 1. Applicant respectfully traverses the Examiner's rejection. Contrary to the Examiner's assertions, **Morton** determines the URL for the greeting data associated with the called party (calling-to-party) at the called party terminal 108. **Morton** is completely silent with respect to subscriber determination. In other words, **Morton** does not determine if the calling-to-party is a service subscriber. Instead, **Morton** determines whether the URL for the greeting data is associated with the called party at the terminal 108 and the telephone 103. See **Morton**, col. 5, lines 26-28.

Additionally, the identifier for the called party derived in step 400 and used in step 401 to determine the URL for the greeting data associated with the called party at terminal 108 in **Morton**, is not sufficient enabling disclosure to anticipate all the features of claim 1 of the present invention. As described in detail above, simply disclosing that the URL is determined for the greeting data and checking the association with the called party does not disclose or anticipate determining if the calling-to-party (called party) is a service subscriber. **Morton** merely determines the URL for the greeting data associated with called party. Therefore, **Morton** does not determine if the calling-to-party is a service subscriber. Therefore, **Morton** fails to disclose the determining feature in claim 1. Accordingly, the Examiner has misinterpreted the determining of the URL for the greeting data associated with the called party to misapply the subject matter of **Morton** to argue anticipation of the features of claim 1 of the present invention. However, in light of the arguments provided herein, Applicant respectfully traverses this rejection. For at least the reasons aforementioned, the pending claims 1-7, 9-13, 15-22 and 24 are in condition for allowance which is respectfully requested of the Examiner.

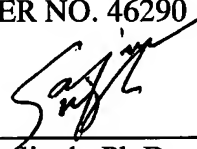
In the Office Action, claims 8, 14, and 23 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over **Lund**. However, **Lund** fails to address the above-indicated shortcomings set forth above in the context of §102 rejections of claim 1.

In view of the foregoing, Applicants respectfully submit that all pending claims are in condition for allowance. The Examiner is invited to contact the undersigned at (713) 934-4089 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

WILLIAMS, MORGAN & AMERSON  
CUSTOMER NO. 46290

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Sanjeev K. Singh, Ph.D  
Rec No. L0220  
10333 Richmond Ave., Suite 1100  
Houston, Texas 77042  
(713) 934-4089  
(713) 934-7011 (facsimile)

AGENT FOR APPLICANTS